

**From:** Ben Davis  
**To:** kevin.rethore@caffhill.com  
**Cc:** Tom Mucci; Courtney Vidales; Kimberly Brusuelas; "Justin Kaufman"; Lauren Martinez  
**Subject:** Regarding: Nupson v. Schnader et al.  
**Date:** Tuesday, January 5, 2021 12:02:31 PM

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Kevin,

It was nice to talk with you today. I spoke with my team. I do not think we can avoid taking Ms. Hughes' deposition. That being said, I am willing to only seek her deposition at this point without any document requests attached. If, during the deposition, we learn of some documents that Ms. Hughes may have that were not previously produced, we will then seek those documents. Hopefully that will make things easier for Ms. Hughes.

Please let me know of a good time and place to depose Ms. Hughes. These are the dates we previously sent: January 21, 22, 25, 26 (after 10:30), 28, February 1, 2 (after 10:30), 3-5, 8, 9 (after 10:30), and 10<sup>th</sup>.

Best,  
Ben

**Ben Davis**  
ATTORNEY

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**EXHIBIT 2**